

May 27, 2020

David J. Bradley, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

ENEAS RAMOS (01)

VICTOR MARTINEZ (02), and

DEMETRIO MARTINEZ-BUCIO (03)

Defendants.

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CRIM. No.:

4:20-cr-231

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Commit Hostage Taking)

Title 18 U.S.C. §1203(a)

From on or about March 10, 2020, to on or about March 16, 2020, in the
Houston Division of the Southern District of Texas, the defendants,

**ENEAS RAMOS and
VICTOR MARTINEZ,**

did combine, conspire, confederate and agree with each other and with others both
known and unknown to the Grand Jury, to intentionally seize and detain and threaten
to kill, injure, and continue to detain certain foreign nationals, in order to compel
others to do an act, namely, to pay a sum of money as an explicit and implicit
condition for the release of said foreign nationals.

In violation of Title 18, United States Code, Section 1203(a).

COUNTS TWO and THREE
(Hostage Taking)
Title 18 U.S.C. §1203(a) and 2

From on or about March 10, 2020, to on or about March 16, 2020, in the
Houston Division of the Southern District of Texas, the defendants,

**ENEAS RAMOS and
VICTOR MARTINEZ,**

did intentionally seize and detain and threaten to kill, injure, and continue to detain
in the United States and elsewhere, certain foreign nationals, as listed in Counts Two
and Three below, in order to compel a third person to do an act, namely, to pay a
sum of money as an explicit and implicit condition for the release of the foreign
nationals.

COUNT:

ALIEN NAME:

TWO

KAJENTHINI ANATHAJEYAM

THREE

KUGANESAN KIRUSHNARASA

In violation of Title 18, United States Code, Sections 1203(a) and (2).

COUNT FOUR
(Conspiracy to Harbor Illegal Aliens)
Title 8 U.S.C. §§ 1324 (a)(1)(A)(v)(I), 1324(a)(1)(A)(iii) and 1324 (a)(1)(B)(i)

From on or about March 10, 2020, to on or about March 16, 2020, in the

Houston Division of the Southern District of Texas, the defendants,

**ENEAS RAMOS,
VICTOR MARTINEZ, and
DEMETRIO MARTINEZ-BUCIO,**

did knowingly combine, conspire, confederate and agree, with each other and with other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is: to conceal, harbor, and shield from detection such aliens in buildings and other places within the United States, knowing and in reckless disregard of the fact that such aliens had come to, entered, and remained in the United States in violation of law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iii) and 1324 (a)(1)(B)(i).

All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I).

**COUNT FIVE
(Possession of a firearm by an illegal alien)
(Title 18 U.S.C. §§ 922(g)(5)(A) and 924(a)(2))**

On or about March 16, 2020, in the Houston Division of the Southern District of Texas, the defendant,

VICTOR MARTINEZ,

who, knowing that he was an alien illegally and unlawfully in the United States, did knowingly possess a firearm, namely a Ruger, model SR 40c, .40 caliber semi-automatic pistol, which had previously been shipped and transported in interstate

and foreign commerce.

In violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(2).

Notice of Criminal Forfeiture
(18 U.S.C. § 982(a)(6); 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c))

The United States hereby gives notice to defendants,

**ENEAS RAMOS,
VICTOR MARTINEZ, and
DEMETRIO MARTINEZ-BUCIO,**

that in the event of conviction of an offense in violation of 18 U.S.C. § 1324, the following property is subject to forfeiture:

(1) All conveyances, including vessels, vehicles or aircraft, used in the commission of the offense pursuant to 18 U.S.C. § 982(a)(6);

(2) All real and personal property that constitutes, or is derived from, or is traceable to, the proceeds obtained directly or indirectly from the commission of the offense pursuant to 18 U.S.C. § 982(a)(6);

(3) All real and personal property that is used to facilitate, or is intended to be used to facilitate, the commission of the offense pursuant to 18 U.S.C. § 982(a)(6); and

(4) All conveyances, including vessels, vehicles, and aircraft, used in the commission of the offense, the gross proceeds of such violation, and all property traceable to such conveyances or proceeds pursuant to 8 U.S.C. § 1324(b) and 28 U.S.C. § 2461(c).

Notice of Criminal Forfeiture
(18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c))

Pursuant to Title 18 United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States hereby gives notice to defendant,

VICTOR MARTINEZ,

that all firearms and ammunition involved in or used in the commission of the offense in violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(2), charged in Count Five, are subject to forfeiture.

Property Subject to Forfeiture

Defendants are notified that the property subject to forfeiture includes, but is not limited to, the following property:

1. Ruger, Model SR 40c .40 caliber semi-automatic pistol, serial number 343-

13339, manufactured outside the state of Texas;

2. Any and all ammunition.

A TRUE BILL:

Original Signature on File

FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
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By:



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